

Oct. 24, 2012

Ms. Marlene H. Dortch  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: **Ex Parte Contact in Universal Service Contribution Methodology, WC Docket No. 06-122**

Dear Ms. Dortch:

On Wednesday, Oct. 24, 2012, Greg Jackson, Vice President of EDUCAUSE, met with Priscilla Argeris in Commissioner Rosenworcel's office and separately with Nick Degani in Commissioner Pai's office to discuss the above-captioned proceeding concerning the contribution methodology for the Universal Service Fund (USF).

Mr. Jackson reiterated the comments filed by EDUCAUSE and the other Higher Education Associations earlier in this proceeding – that a numbers-based system would be inconsistent with the Commission's fairness goal because having a telephone number does not reflect one's actual use of the Public Switched Telephone Network, that imposing a fee based on telephone numbers would be particularly unfair and burdensome on institutions of higher education that may need telephone numbers but do not make many long distance calls, and that higher education stands ready to work with the Commission if it chooses to implement a connections-based system or adjust the revenues-based system.

Mr. Jackson indicated that EDUCAUSE had surveyed higher education institutions and found that, in general, higher education would pay about 10 to 20 times more in USF fees under a numbers-based regime. He noted that there is no opportunity for higher education to recover these additional fees from end users (because the college/university is already an end user). The added funds to pay the higher USF fees would have to come from faculty or staff salaries or reductions in other services provided to students. Furthermore, private networks (such as the inside wire in homes and buildings, intra-corporate networks, and internal campus networks) serve a closed set of users, are separate from the public network and should not be required to support the costs of those public networks by paying directly into the USF.

Pursuant to the Commission's rules, this notice is being filed in the above referenced docket. Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "John Windhausen, Jr." with a small flourish at the end.

John Windhausen, Jr.  
Telepoly Consulting  
[jwindhausen@telepoly.com](mailto:jwindhausen@telepoly.com)  
(202) 256-9616